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**From:** Beverley Rutherford [beverley.rutherford@vacu.org]  
**Sent:** Tuesday, April 11, 2006 9:43 AM  
**To:** Comments, Regulation  
**Subject:** SAR Form Revisions

Attn: 1506-0001, Revised Suspicious Activity Report by Depository Institutions

Thank you for the opportunity to comment on the revised SAR. I am responding on behalf of a state chartered credit union located in Virginia.

We support the changes that have been proposed. We also offer the following comments regarding SAR revisions which we urge the agencies to consider. We urge NCUA, jointly with the other agencies, to consider raising the reporting threshold to file (with a suspect identified) above the current \$5,000. We also ask that the file time be amended from 30/60 days to 60/90 days to allow time to complete investigations which would result in more complete SARs filed and fewer amended reports. Lastly, eliminating the need to file on domestic cases, for example between spouses, would reduce the number of SARs filed which would reduce the burden on both credit unions and the volume of reports investigators must review.

Please feel free to contact me should you need clarification or have any questions about these comments. Thank you.

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